

# CONFLICT MINERALS POLICY

## Overview

In July 2010, President Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. On August 22, 2012, the Securities and Exchange Commission (the “SEC”) adopted a conflict minerals rule (the “Conflict Minerals Rule”) as mandated by Section 1502 of the Dodd-Frank Act. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the Democratic Republic of the Congo (the “DRC”) and its adjoining countries.

To the extent that “conflict minerals” are necessary to the functionality or production of products that Weinschel Associates manufactures or contracts to manufacture, we are required to conduct supply chain diligence to determine whether the conflict minerals originated in the DRC or one of the other covered countries.

“Conflict minerals” are defined in the Conflict Minerals Rule as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. In addition to the DRC, the “covered countries” are defined in the Conflict Minerals Rule as: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

## Policy Statement

Weinschel Associates commits to refrain from, directly or indirectly, taking or supporting any action which contributes to the financing of armed groups that are committing human rights abuses in the DRC and other covered countries. Weinschel Associates has adopted this policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict. Additionally, we are promoting the institution of our policy to pursue the objective of providing to our customers the reasonable types of assurances that they may require that our products are, indeed, conflict free.

Weinschel Associates does not typically source conflict minerals directly from mines, smelters or refiners, and, accordingly, in most cases, is several levels removed from these market participants. Weinschel Associates, therefore, requires the cooperation of its suppliers in the implementation of this policy.

## Supplier Requirements

Weinschel Associates will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Consistent with the foregoing, those of our Suppliers who supply or manufacture components, parts or products containing conflict minerals and wish to continue to do business with Weinschel Associates, are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict or human rights abuses. Without limiting the foregoing, our suppliers are expected to directly and indirectly source conflict minerals *only* from sources that do not directly or indirectly benefit or finance “armed groups” (as that term is defined in the Conflict Minerals Rule) in the DRC or another covered country.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

Weinschel Associates reserves the right to request from any supplier at any time such information, certifications and documentation as it shall deem necessary to monitor or assess compliance with this policy.

Weinschel Associates believes in establishing and maintaining long-term relationships with suppliers whenever possible. Yet, if we determine that a supplier is actively violating this policy, then we will require the supplier to commit to devise and undertake expeditiously, a suitable corrective action plan. Any supplier’s continuing failure to adhere to Weinschel Associates policies and/or a refusal on its part to address issues of concern will likely lead to suspension or termination of our business relationship.